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A Limited Liability Partnership

Including Professional Corporations

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Attorneys for Defendants,

TESLA, INC. dba TESLA MOTORS, INC.

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

DEMETRIC DI-AZ, OWEN DIAZ AND
LAMAR PATTERSON

Plaintiffs,

v.

TESLA, INC. DBA TESLA MOTORS,
INC., CITISTAFF SOLUTIONS, INC.;
WEST VALLEY STAFFING GROUP;
CHARTWELL STAFFING SERVICES,
INC.; NEXTSOURCE, INC.; and
DOES 1-10, inclusive

Defendants.

Case No. 17-cv-06748-WHO

**DECLARATION OF SUSAN HAINES IN
SUPPORT OF DEFENDANT TESLA, INC.'S
MOTIONS *IN LIMINE***

Date: May 11, 2020

Time: 10:00 a.m.

Courtroom: 2, 17th Floor

Judge: Hon. William H. Orrick

Trial Date; June 8, 2020

Complaint Filed: October 16, 2017

DECLARATION

I, Susan Haines, declare as follows:

1. I am currently an attorney with the law firm Sheppard Mullin Richter & Hampton, LLP which serves as Defendant Tesla, Inc.'s ("Tesla") attorneys of record in the above-captioned matter. I am a member in good standing of the State Bar of California. I have personal knowledge of the facts set forth in this declaration and, if called as a witness, could and would testify competently to such facts under oath.

2. **Exhibit 1** to this declaration consists of true and correct copies of relevant excerpts from the deposition of Titus McCaleb, taken in the above captioned matter on June 18 2019.

3. **Exhibit 2** to this declaration consists of true and correct copies of relevant excerpts from the deposition of Owen Diaz, taken in the above captioned matter on December 3, 2018.

4. **Exhibit 3** to this declaration consists of true and correct copies of relevant excerpts from the deposition of Teresa Kossayian, taken in the above captioned matter on April 24, 2019.

5. **Exhibit 4** to this declaration consists of true and correct copies of relevant excerpts from the deposition of Annalisa Heisen, Tesla's 30(b)(6) designee, taken in the above captioned matter on May 29, 2019.

6. **Exhibit 5** to this declaration consists of true and correct copies of relevant excerpts from the deposition of Amy Oppenheimer, taken in the above captioned matter on March 9, 2020.

7. **Exhibit 6** to this declaration consists of true and correct copies of relevant excerpts from the deposition of Andres Donet, taken in the above captioned matter on October 24, 2019.

8. **Exhibit 7** to this declaration consists of true and correct copies of relevant excerpts from the deposition of Owen Diaz, taken in the above-captioned matter on May 22, 2018.

9. **Exhibit 8** to this declaration consists of true and correct copies of relevant excerpts from the deposition of Erin Marconi taken in the above captioned matter on October 21, 2019.

10. **Exhibit 9** to this declaration consists of true and correct copies of relevant excerpts from the deposition of Lamar Patterson, taken in the above captioned matter on July 26, 2019.

11. **Exhibit 10** to this declaration consists of true and correct copies of relevant excerpts from the deposition of Tomatsu Kawasaki, taken in the above captioned matter on

1 October 9, 2019.

2 12. **Exhibit 11** to this declaration consists of true and correct copies of relevant
3 excerpts from the deposition of Michael Wheeler, taken in the above captioned matter on June 12,
4 2019.

5 13. **Exhibit 12** to this declaration consists of true and correct copies of excerpts from
6 the deposition of Wayne Jackson, taken in the above captioned matter on May 17, 2019.

7 I declare under penalty of perjury under the laws of the United States of America that the
8 foregoing is true and correct.

9 Executed this 20th day of April 2020, at Dallas, Texas.

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11 /s/ Susan Haines
12 Susan Haines
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